Allen R. Blough,
Reactor Projects, Section 1A,
Division of Reactor Projects,
MRC Region 1,
631 Park Avenue, King of Prussia, Fa.

Dear i.r. Blough:

As I mentioned to you in the beginning of the Unit! Salp Meeting, I'm forewarding the identifying data on the Day 31 page from the B&W Trial records. The page in quest! I is the R. L. Long Exibits...Exibit Number 692. According to the cc s in the accompanying cover letter, a copy of the exibit, a sequence of events, and the letter were sent to a B.M. Grier of Region 1's Office of Inspection and Enforcement, so you may have a full copy somewhere in Region 1..it also went to an S. A. Varga in D.C.. Enclosed is a xerox of the cover letter.

The Day 31 events did rates some additional questions regarding steam generators which primary to secondary contamination of note occurs...who authorizes the continued use...or putting back in use of said generators..and what are the factors governing such decisions. If I understood correctly...there has been some initial study or decision underway which advocates the steaming on the damaged generator, rather than its isolation...and that by so doing...releases would purportedly be lower to the environment outside the plant. Could you comment on that again, or could ir. Conte..I believe he mentioned the study in progress. I may not have understood the commerts made re. the proceedures to be followed regarding significant steam tube leaks, or steam tube failures.

Of course, it must be assumed that all tube failures would be significant.

Also note on day 32, the B Generator was apparently isolated again, because measurements on the station vent monitor increased.

Actually....the Turbine Bypass valves were isolated. Would this mean B was isolated totally re. releases? The readings on the 32nd day were felt to have been due to the changing of a charcoal filter; however, one might still wonder about the cause of the increased levels of radioact; we materials present in THI 2 on the 31st day of the accident. Am also wondering what stack monitor read in the 31st day, also if some defect exists, or potential for added releases is present in condensors that would have caused releases like those noted on Day 31?

Sincerely,

Deborat la resport

1802 Larket Street,

Camp Hill, Penna. 1701;

1- 717- 763-9552

Also note, are copies of my letters, and the xeroes as well being sent to the FDRs and the service lists,; nove not been able to get to document room, and was not certain if all data was being sent through. If it has not included, I would like to request that all letters and xeroxes be sent out to all of lists etc...

if so I thank you retrospectively.

Post Office Box 542 Sincerely, --/s/ J. G. Herbein J. G. Herbein Vice President-Generation

Hr. B. H. Grier, Director Office of Inspection & Enforcement U. S. Muclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

Three Mile Island Muclear Station Unit 2 (TMI-2) Operating License No. DPE-73
Docket No. 50-320

In our letter of July 16, 1979, we indicated that by July 20, 1979, we would submit a detailed Sequence of Events covering the period through April 30, 1979. Enclosed please find that Sequence of Events. Please add this attachment to Section I of our July 18, 1979 submittal.

JGH: RAL: tas

Enclosure !

cc: Director of Muclear Reactor Regulation Attn: S. A. Varge Light Water Reactors Branch No. 4 13 U. S. Buclasr Regulatory Commission Washington, D.C. 20555

Bett Exh. For 10 PH. SAMOU 5 Harvey B. Kramer CSR J Dogla Reporting Inc.

Inter-Office Memorandum

JULY 17, 1979

PRILDIDIARY ANNOTATED SEQUENCE OF EVENTS, MARCE 29, 1979 TERM APRIL 30, 1979, REV. 0

□ Service

	* · · · · · · · · · · · · · · · · · · ·			
MESSES.	L. ALHOLD	- ALL . 11 43 .		
	M. BEZELLA		W.	HOREAD
	Z. BLAKE	1.1	M.	MORITTE
	T. BROUGHTO		L.	ROCERS
1.	J. DANIETS		3.	MISCHE!
Ø	H. DIECTUR		J.	SEELING
-	DRYG		J.	THORPE
S	J. HERSEIN		A.	TSACGAST
111.	I. HIWARD		T.	VARWITAL
	R. ITATEY		E.	RALLACE
	W. LAVALLEZ	/PP=== :	R.	WILLIAMS
	J. LOGAY	(1111)	I.	VILSON
	L. LONG		K.	BOODWARD
	G. HILLER		E.	ZZBROSKI

Enclosed is the 7/16/79 draft of Rev. O to the "Freliminary Annotated Sequence of Events, March 29, 1979 thru April 30, 1979". Should you have any comments, please return them to me no later than

Accident Assessment Documentation

GPU Service Corporation & a sucsidary of General Public Unities Corporation

Presentiar Level Transmitter (IC-1-LIJ) failed. The operator commenced Inergency Procedure IT-21, "Total Loss of Pressuriser Level Indication" t

In preparation for natural circulation, Steam Cenerator 3 vas standed to the condenser using the Turbine Typess Talves at 252 open. Due to this steering, incresses in sirborne radioactivity were detected. Respirators were required in the Courrel loom for several minutes and in the Turbine Natiding for between three to four bours. All unnecessary personnel were evacuated from Unit 2 Control and Turbine Buildings. Initially it was thought that the high airborne scrivity was Todine. Later events showed that the activity was mostly Zenou 133 with traces of Zenou 131 and 135 which had saturated the SAM-2 detectors and gave a false Icdi- indication. The state of the s

The transition to matural circulation was accomplished at 140% bours by scopping lasctor Coclant Purp 21 (IC-7-21). Steam Caparators A and 3 vers med to pass steam to the coodensor through the Turbins Bypass Talves CMS-VZCA, 25A) which were 100 % and 25% open, respectively. Yesteral circulation and cooldown as 5° I per hour went smoothly, with di . - 107. and die - Lay. Don to low streeting rate on Stars Constator I the dig altimately increased to approximately AAT. Because of the degreeation of the Pressurizer and Steam Generator level instrumentation the transition to natural circulation was initiated shead of schedule.

"Note: dI and dI represent the temperature difference across the princip sides of Stare Cenerators "A" and "3", respectively.

### SUPPLARY OF MAJOR EVENTS OCCURRED ON DAY 32

- 1. At 0110 hours the Turbine Sypass Valves for Stage Generator 3 (25-7-253 and 268) were isolated. This was initiated when the Station Vent Radiation Monitor EFR-219 increased. It was later determined that the increase was due to changing the charcoal filters. This was scheduled to be done at midnight (0000 hours), but due to delays it was done around 0100 hours.
- 2. Pressurizer level was being calculated using Emergency Procedure IP-21.
  Total Loss of Pressurizer Level Indication.\* This value was being compared with Pressurizer Level Transmitter (RC-1-LT3) which was back in service.
  The decision was made not to use the back-up Baise gauge due to its poor correlation to the measured level.
- 3. Average Resctor Coolant temperature decreased from 1827 to 1757 during the day as natural circulation continued.
- 4. Approximately 1940 gallous of water were added to the Makeup Tark (MD-T-1).





# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I

631 PARK AVENUE KING OF PRUSSIA, PENNSYLVANIA 19406

JAN 1 5 1987

Docket No. 50-289

Ms. Deborah Davenport 1802 Market Street Camp Hill, Pennsylvania 17011

Dear Ms. Davenport:

This is in response to your letters, dated September 15 and 30, 1986, to me. We have summarized our responses to questions in your letters in the attachment. Your letters are attached for completeness and forwarding to the docket rooms. If you have questions, please contact either Rich Conte (215-337-5146) or me.

Sincerely,

Allen R. Blough, Chief Projects Branch No. 1

Division of Reactor Projects

Attachments: As Stated

CC: PDR LPDR

Senior Resident Inspector (TMI-1)

bcc:

A. Blough

R. Conte

W. Baunack

K. Abraham

4 88

# RESPONSES TO D. DAVENPORT LETTERS

# A. Letter dated September 15, 1986

1. In reference to releases during a steam tube failure, provide copies of any evaluation or procedures that are available.

#### Response

The design basis steam generator tube rupture event was evaluated in relation to the Kinetic Expansion repair process for the TMI-1 steam generator tubes. The results of that review are documented in NUREG 1019 (Section 4) and Supplement 1 (Section 4), which should be available for review in the Local Public Document Room (LPDR). Specifically Sections 4.3 of both documents address this topic along with licensee procedures for handling such events. Further, the licensee's methodology for handling such events are being generically reviewed under TMI Task Action Plan (TAP) Item No. I.C.1, "Accident and Procedure Review." Recent licensee submittals on this topic should also be available for review in the LPDR.

2. Several sections of the letter reiterate the request for a filter on the condenser off-gas system.

# Response

This request was answered in a letter, dated November 26, 1986, from H. Denton, NRR, to you.

# B. Letter dated September 30, 1986

 Comment on the steaming of, rather than isolating, a damaged steam generator (upon tube rupture) and how that lowers releases to the environment.

#### Response

If a steam generator tube rupture should occur along with multiple tube ruptures, the best way to stop the ensuing primary to secondary leakrate is to cooldown and depressurize the reactor coolant system. The quickest way to do that within cooldown limits is to use both steam generators rather than other slower methods such as steaming one undamaged steam generator or using the RCS feed and bleed methodology. Use of the steam generator is complicated by releases of radioactivity eventually through the condenser off-gas system or through the steam generator safety/relief valves if the leak is large enough to cause RCS pressure (if above 1040 psig) to be applied to the secondary side of the steam generator (relief valve settings at 1040-1100 psig). Releases are inevitable but they are within

design basis limits (10 CFR 100) for the design basis event (single tube failure). The licensee is also prepared for the beyond-design-basis event (multiple tube failure) in order to minimize releases to the public. For any of the events noted above and those releases, there will be a dose rate to the public. The licensee's approach is to shorten, as much as possible, the length of time to stop the primary to secondary leakage, so that the total dose to the public will be lessened. This approach is under generic review by NRC as stated in paragraph A.1 above.

Briefly, upon detection of primary to secondary leak rate of 1 to 50 gpm, licensee procedures require the plant to be shutdown and immediately cooled to below  $540^\circ$  F (from the normal  $579^\circ$  F); and an orderly cooldown and depressurization is commenced. The affected steam generator is isolated if the off-site dose projection approaches 50 mR/hr whole body or 250 mR/hr thyroid dose rate.

In reference to day 32 after the TMI-2 accident, Ms. Davenport asks that, if the turbine bypass was isolated, would that mean the "B" steam generator would be isolated totally with respect to releases? For day 31, what were the stack monitor releases at TMI-2?

#### Response

In response to your specific question about the turbine bypass valve, a number of valves in the main steam and feedwater system must be shut to isolate a steam generator; e.g., main steam isolation valves and feedwater isolation/block valves. Even with this isolation, there is a possible release path from an isolated steam generator through the steam generator safety/relief valve, which could actuate automatically on a high pressure situation in the steam generator (at approximately 1040-1100 psig). Even with the design, as noted in the NRR letter to you dated November 26, 1986, the TMI-1 design meets the objective of 10 CFR 50 Appendix I.

The TMI-2 accident and subsequent days after that event have been extensively reviewed and evaluated by NRC staff. It would not be an appropriate expenditure of NRC staff resources to revisit and answer specific questions about those events unless a new safety question needs to be addressed. Your request for a filtration system on the condenser off-gas system, has been reviewed by NRC staff and answered by Mr. Denton's letter.

 Are copies of my letters being sent to PDR's and service lists? If not, I am requesting that they be sent to all lists, etc.

### Response

All of your letters to Region I are being sent to the PDR and LPDR, either separately or by attachment to the NRC staff response letters. Any discrepancies in that regard should be brought to our attention. With respect to the service list, it is not the policy of Region I to serve this type of correspondence on the Board or parties.